

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

October 22, 1997

Mr. Phil Lowry
Vice President of Operations
Northern Natural Gas Company
1111 South 103rd
P.O. Box 3330
Omaha, NE 68124-1000

CPF No. 37118M

Dear Mr. Lowry:

On May 5-9, June 2-5, and June 16-20, 1997, representatives of the Central Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of Northern Natural Gas Company's facilities in South Sioux City, NE, Mullinville, KS, Sublette, KS, and Hugoton, KS.

As a result of the inspection, it appears that you have committed a probable violation, as noted below, of the pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The item inspected and the probable violation is:

1. **§ 192.605(c) Procedural Manual for Operations, Maintenance, and Emergencies - Abnormal Operations.**

Each operator shall prepare and follow for each pipeline system, a manual of written procedures for conducting operations and maintenance activities and for emergency response.

a) For transmission lines, the manual must also include procedures for handling abnormal operations. The manual must include procedures to provide safety for the following when operating design limits have been exceeded. This includes responding to, investigating, and correcting the cause of:

- i) Unintended closure of valves or shutdowns;
- ii) Increase or decrease in pressure or flow rate outside normal operating limits;
- iii) Loss of communications;
- iv) Deviations from normal operations and personnel error

Review of Northern Natural Gas Company's O&M procedural manual found that the procedures for the above listed items were inadequate. We believe that the procedures require expansion to include additional detail, rather than a re-statement of what is in Part §192.

b) The manual required by paragraph (a) of this section (§ 192.605) must include procedures to provide safety during maintenance and operations. Procedures for operating maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

Review of Northern Natural Gas Company's leak repair procedures found that they did not contain any procedures for the use of foreman plugs or nightcaps. Due to the recent number of incidents resulting from the improper use of these devices, we believe procedures need to be written in the O&M to ensure proper use of this piece of equipment.

When it is found that an operator's procedures are inadequate, 49 C.F.R. § 190.237 provides that the operator, after notice and opportunity for hearing, may be required to amend its plans and procedures and the response options as prescribed under § 190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, please provide the revised procedures within thirty (30) days of receipt of this notice.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety